IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

CATHERINE AND RICHARD SNYDER,	)	
	)	
Pro Se Plaintiffs,	)	
	)	
v.	)	No. 1:07-cv-469
	)	
GREENBERG TRAURIG, LLP, *et al.*	)	
	)	
Defendants.	)	
	)	

EMERGENCY MOTION FOR TWO-WEEK ENLARGEMENT OF TIME TO FILE RESPONSIVE PLEADING

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7(i), Defendant Greenberg Traurig, LLP ("Greenberg Traurig") hereby respectfully moves for a two-week enlargement of time in which to file a responsive pleading under Rule 12 of the Federal Rules of Civil Procedure. Plaintiffs Catherine Snyder and Richard Snyder do not consent to this motion.

In support of this motion, Greenberg Traurig states as follows:

1. Plaintiffs served the Complaint on Greenberg Traurig's registered agent on May 22, 2007. As a result, Rule 12 of the Federal Rules of Civil Procedure requires Greenberg Traurig to file a responsive pleading no later than Monday, June 11, 2007.

2. Greenberg Traurig retained the undersigned counsel in the evening on Wednesday, June 6, 2007 – five days (and three business days) before the responsive pleading deadline.

3. Because the newly retained counsel will not have adequate time to assess the Complaint, consult with Greenberg Traurig regarding the allegations, and prepare a

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responsive pleading in advance of the deadline, an enlargement of two weeks is warranted.

4. Granting a two-week enlargement will serve the public interest. In particular, a two-week enlargement will ensure that the Court does not devote its resources, perhaps unnecessarily, to a proceeding in which Greenberg Traurig's counsel did not have adequate time to assess the sufficiency and accuracy of Plaintiffs' claims.

For the foregoing reasons, Greenberg Traurig respectfully moves this Court to enlarge the time in which to file its responsive pleading by two weeks.

Dated: June 7, 2007

Respectfully submitted,

HARRIS, WILTSHIRE & GRANNIS, LLP

______________/S/_________________

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Attorneys for Defendant Greenberg Traurig, LLP

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CATHERINE AND RICHARD SNYDER,	)	
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Pro Se Plaintiffs,	)	
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v.	)	No. 1:07-cv-469
	)	
GREENBERG TRAURIG, LLP, *et al.*	)	
	)	
Defendants.	)	
	)	

PROPOSED ORDER GRANTING EMERGENCY MOTION FOR TWO-WEEK ENLARGEMENT OF TIME TO FILE RESPONSIVE PLEADING

For the reasons set forth in Defendant Greenberg Traurig, LLP's Emergency Motion for Two-Week Enlargement of Time to File Responsive Pleading, the Court hereby GRANTS the motion and ORDERS Defendant Greenberg Traurig LLP to file a responsive pleading no later than Monday, June 25, 2007.

SO ORDERED.

____
The Honorable Gerald Bruce Lee
United States District Court Judge
Eastern District of Virginia

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Emergency Motion for Two-Week Enlargement of Time to File Responsive Pleading was sent to *pro se* Plaintiffs Catherine Snyder and Richard Snyder by first-class mail on this 7th day of June, 2007, at the following address:

Catherine Snyder and Richard Snyder
603 Nash Street
Herndon, VA 20170

______/s/____________

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